

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson; JAMISON J., by and through his next friend, Clara Lewis; DESIREE, RENEE, TYSON, and MONIQUE P., by and through their next friend, Sylvia Forster; JOHN A., by and through his next friend, James D. Johnson; CODY B., by and through his next friend, Sharon Scott; MARY, TOM, MATTHEW, and DANA W., by and through their next friend, Zelatra W.; AND SAM H., by and through his next friend, Yvette Bullock; on their own behalf and behalf of all others similarly situated,

Plaintiffs.

v.

CIVIL ACTION NO.
3:04-CV-251-TSL-FKB

PHIL BRYANT, as Governor of the State of Mississippi; DONALD TAYLOR, as Executive Director of the Department of Human Services; AND BILLY MANGOLD, as Director of the Division of Family and Children's Services,

Defendants.

AMENDED NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **David Chandler**, former Commissioner for the Mississippi Department of Child Protection Services, on Thursday, November 29, 2018, beginning at 11:00 a.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 400, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A attached hereto.

RESPECTFULLY SUBMITTED, this, 14th day of November, 2018.

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)
Erica A. Reed (*pro hac vice*)
A Better Childhood, Inc.
355 Lexington Avenue, Floor 16
New York, NY 10011
Telephone (646) 808-7344
Facsimile: (914) 238-0365
Email: mlowry@abetterchildhood.org
ereed@abetterchildhood.org

W. Wayne Drinkwater, Jr. (MBN 6193)
Michael J. Bentley (MBN 102631)
BRADLEY ARANT BOULT CUMMINGS LLP
One Jackson Place, Suite 400
188 East Capitol Street
Jackson, Mississippi 39201
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
Email: wdrinkwater@bradley.com
mbentley@bradley.com

Christian Carbone (*pro hac vice*)
LOEB & LOEB LLP
345 Park Avenue
New York, New York 10154
Telephone: (212) 407-4000
Email: ccarbone@loeb.com

PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)

EXHIBIT A

Documents within your possession, custody, or control that were not previously produced and ***that contain your handwritten notes*** concerning any of the below-listed subject areas:

1. Budget requests submitted by Mississippi Department of Child Protection Services to the Mississippi Legislature for SFY 2019;
2. The SFY 2018 deficit;
3. The SFY 2019 deficit;
4. Efforts to secure additional funding for SFY 2019.